

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

15 MISC 0037

LOIDA NICOLAS LEWIS,

Plaintiff,

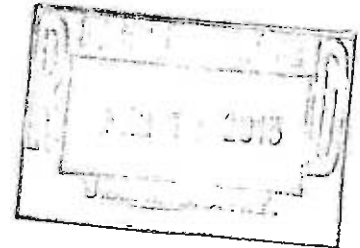
-against-

BROADCASTURBAN FILMWORKS, LLC,

Defendant.

Misc. Case No.: _____

**NOTICE OF MOTION TO
COMPEL RESPONSE TO
POST-JUDGMENT DISCOVERY**



To: BroadcastUrban Filmworks, LLC
1300 Pennsylvania Avenue NW, #700
Washington, DC 20004

PLEASE TAKE NOTICE that Loida Nicolas Lewis (the "Judgment Creditor") by her undersigned counsel, will move this Court before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse, located at 500 Pearl Street, Courtroom 14B, New York, New York 10007, on Tuesday, March 3, 2015, at 10:00 A.M., for entry of an order pursuant to Federal Rule of Civil Procedure 37, compelling defendant BroadcastUrban Filmworks, LLC (the "Judgment Debtor") to respond to a post-judgment discovery request served pursuant to FRCP 69(a)(2), and for such other and further relief as the Court may deem just and proper.

In support of this motion Judgment Creditor will rely upon the affidavit of Kevin Fritz, Esq., and all prior proceedings had herein.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rules of Civil Procedure 6.1(b)(2) any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers.

Dated: New York, New York
February 10, 2015

Loida Nicolas Lewis by her Attorneys

A handwritten signature in black ink, appearing to read 'Kevin A. Fritz', written over a horizontal line.

Kevin A. Fritz, Esq.

MEISTER SEELIG & FEIN LLP

125 Park Avenue, 7th Floor

New York, New York 10017

Tel: (212) 655-3500

Email: kaf@msf-law.com

To:

Bob Pickett, Esq.
Pickett & Craig, Attorneys At Law
80 Main Street, Suite 430
West Orange, New Jersey 07052